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Attorneys for Public Entities Impacted by the Wildfires

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA**

In re

PG&E CORPORATION,

and

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

\*All papers shall be filed in the Lead Case,  
No. 19-30088-DM.

Case No. 19-30088-DM

Chapter 11  
Lead Case, Jointly Administered

**WITHDRAWAL OF LIMITED OBJECTION  
OF PUBLIC ENTITIES IMPACTED BY  
THE WILDFIRES TO TCC'S BAR DATE  
MOTION AND STATEMENT WITH  
RESPECT TO THE RESPECTIVE BAR  
DATES FOR WILDFIRE CLAIMS  
PROPOSED BY EACH OF THE DEBTORS  
AND THE OFFICIAL COMMITTEE OF  
TORT CLAIMANTS IN THEIR  
RESPECTIVE PLEADINGS TO THIS  
COURT**

Date: June 26, 2019  
Time: 9:30 a.m. (prevailing Pacific time)  
Place: 450 Golden Gate Avenue, Ctrm 17  
San Francisco, CA 94102  
Judge: Hon. Dennis Montali

The Public Entities Impacted by the Wildfires (the “**Public Entities**”)<sup>1</sup> hereby **WITHDRAW** their *Limited Objection of Public Entities Impacted by the Wildfire to Motion of the Official Committee of Tort Claimants Pursuant to 11 U.S.C. §§ 105(a), 501 and Fed. R. Bankr. P. 3001(a), 3003(c), 5005 and 9007 for Entry of an Order (I) Establishing a Bar Date for Filing Fire Claims, (II) Approving the Form and Procedures for Notice of the Bar Date for Fire Claims, and (III) Approving Supplemental Procedures for Notice of the Bar Date to Fire Claimants* [Docket No. 2654] (the “**PE Limited Objection to TCC’s Bar Date Motion**”) and provide the following statement with respect to the respective bar dates for Wildfire Claims proposed by each of the Debtors and the Official Committee of Tort Claimants (the “**TCC**”) in these bankruptcy cases:

**WITHDRAWAL OF LIMITED OBJECTION AND STATEMENT  
WITH RESPECT TO PROPOSED BAR DATES**

On June 19, 2019, the Public Entities filed the PE Limited Objection to TCC’s Bar Date Motion wherein the Public Entities expressed their concern that the January 31, 2020 bar date proposed by the TCC could possibly delay resolution of the Public Entities’ Wildfire Claims. After reviewing subsequent pleadings filed by interested parties in these bankruptcy cases, and after further consideration of, and deference to, the facts and circumstances of each of the other interested parties who will be affected by any bar date ordered by this Court, the Public Entities hereby WITHDRAW the PE Limited Objection to TCC’s Bar Date Motion. The Public Entities do not oppose either the January 31, 2020 bar date proposed by the TCC or the October 21, 2019 bar date proposed by the Debtors. However, the Public Entities urge this Court to enter an order

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<sup>1</sup> The Public Entities consist of the following California public entities: (a) Calaveras County Water District, (b) Napa County, (c) City of Napa, (d) Mendocino County, (e) Lake County, (f) City of Clearlake, (g) Nevada County, (h) Yuba County, (i) City of Santa Rosa, (j) Sonoma County, (k) Sonoma County Agricultural Preservation and Open Space District, (l) Sonoma County Community Development Commission, (m) Sonoma County Water Agency, (n) Sonoma County Sanitation District, (o) Town of Paradise, and (p) Butte County.

1 establishing a bar date that encourages prompt confirmation of a plan of reorganization in these  
2 bankruptcy cases.

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4 Dated: June 21, 2019

STUTZMAN, BROMBERG, ESSERMAN &  
PLIFKA, P.C.

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6 By: /s/ Sander L. Esserman

Sander L. Esserman  
Attorneys for Public Entities Impacted by the Wildfires

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10 Dated: June 21, 2019

BARON & BUDD, P.C.

11  
12 By: /s/ Scott Summy

Scott Summy  
Attorneys for Public Entities Impacted by the Wildfires

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15 Dated: June 21, 2019

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16  
17 By: /s/ Kimberly S. Fineman

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